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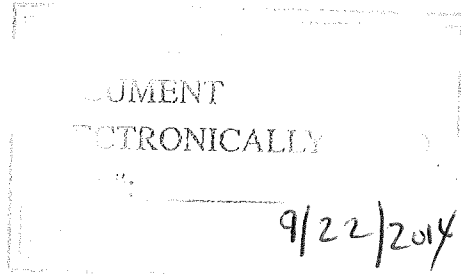
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September 19, 2014

VIA ECF

The Honorable Denise L. Cote  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Room 1610  
New York, N.Y. 10007



**MEMO ENDORSED**

Re: In re Application Pursuant to 28 U.S.C. § 1782, No. 14-Misc-258

Dear Judge Cote:

We represent Petitioners. We respectfully submit this letter jointly with counsel for the Nygård Companies, Peter Nygård, and Stephen Feralio (the "Parties") to provide a status update regarding negotiations related to a protective order in connection with Petitioners' Section 1782 Application.

Counsel for the Parties have met and conferred to address issues related to the protective order, and have exchanged drafts and redlines of the protective order. While counsel have reached agreement as to a number of issues in dispute, there are still areas of disagreement. Counsel plan to meet and confer this weekend in an effort to resolve open issues. With the Court's permission, counsel respectfully request to provide final submissions regarding the protective order to the Court by close of business on Monday, September 22, 2014.

We thank the Court for its kind consideration.

Respectfully submitted,

Avi Weitzman

AW/cjc

*Granted.*

*James G. [Signature]*  
Sept. 22, 2014

cc: Counsel for the Nygård Companies, Peter Nygård, and Stephen Feralio (via email)